

UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Tadeusz Konopka

Debtor

:
:
: Chapter 13
: Case No: 5:16-bk-03111

Debtor's Response to the Notice of Intent to Dismiss for nonappearance

NOW COMES, Tadeusz Konopka (Debtor) by and through his attorney,
Jason M. Rapa, Esquire hereby responds to the Notice of Intent to Dismiss for
nonappearance.

1. Debtor filed a Chapter 13 Bankruptcy Case on July 28, 2016.
2. Meeting of Creditors was scheduled for September 12, 2016, in which
Jason M. Rapa, Esquire was unable to attend.
3. Attorney Rapa emailed correspondence advising that Attorney Rapa was
unable to attend due to a scheduling conflict and the Trustees office
advised and that a new hearing would be scheduled.
4. A Second Meeting of Creditors was scheduled for October 17, 2016 in
which proper notice was provided to the Debtor.

5. Debtor did fully intend to appear before the Trustee for the second Meeting of Creditors, however became lost when traveling to the hearing. After communication with the debtor, Attorney Rapa's staff and Attorney Rapa, it was noted that debtor would be late by approximately thirty (30) minutes.
6. After communicating this information, it was advised that the Trustee had completed the hearings for the day.
7. Debtor did appear on October 17th, 2016, unfortunately it was after the Trustee already left and concluded the hearings for the day. Due to his appearance, albeit late, debtor showed good cause that he was actively participating in his Meeting of Creditors.

WHEREFORE, Debtor respectfully request this Honorable Court dismiss the Notice of Dismissal due to nonappearance and reissue a new date and time for the Meeting of Creditors.

Respectfully Submitted,

/s/ Jason M. Rapa, Esq. _____
JASON M. RAPA, ESQUIRE
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